

The Wind Group Privacy and Cookie Policies  
Revised May 25, 2018

The following policies applies to Wind Corporation DBA Wind Hardware, Zephyr Lock, LLC, Zephyr Fluid Solutions LLC and Sirocco LLC (collective known as “The Wind Group”, “Wind”, “we” or “us”). This Privacy and Cookie Policies (the "Policy" or “Policies”) becomes effective on May 25, 2018 for all users.

We, The Wind Group, with offices at 30 Pecks Lane, Newtown, Connecticut, USA, explain in these Policies how we collect, process and/or use information that we receive via our websites, emails we send, and mobile applications (collectively, the "Platform") that link to this Policy, as amended from time to time. These Policies describe how Wind collects, processes, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access, and correction of your personal information. For purposes of these Policies, personal information shall mean any information relating to an identified or identifiable natural person.

### **Privacy Policy**

This Policy describes the privacy practices of the Wind Group for data that we collect:

- through websites operated by us from which you are accessing this Privacy Policy (collectively, the “Websites”)
- through the software applications made available by us for use on or through computers and mobile devices (the “Apps”)
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our “Social Media Pages”)
- through HTML-formatted email messages that we send you that link to this Privacy Statement and through your communications with us
- when you place a purchase with us, or through other offline interactions

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “Online Services” and, together with offline channels, the “Services.” By using the Services, you agree to the terms and conditions of this Privacy Statement.

#### **1. What Information We Collect**

- a. We collect information about you to provide our services. In order for us to best provide our services to you (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. This means that the data collection is largely necessary for fulfilling the relationship we have with you, and where that is not the case, we have a legitimate interest in collecting the information described below.
  - i. Personal Information (name, home or mailing address, phone number, email address)
  - ii. Account Information (personal contact information, account login information, demographic information)
  - iii. Demographic Information (age or age range, gender, geographic location [post code, city and state, mobile location])
  - iv. Technology Information (IP address, internet browser and devices used, cookie, pixels, website addresses from which the website was accessed)

#### **2. How is the Information being Collected**

- a. Information You Give Us
  - i. When you fill out registration forms or provide us with other personal information actively, we collect that information for processing and use in accordance with this Policy. Here are some examples of situations in which you will have the opportunity to provide personal information to us:
    1. Creating an account;
    2. Registering on our website;

3. Signing up for email alerts or Newsletters;
  4. Completing a form related to one of our products or services;
  5. Contacting us for technical support or customer service;
  6. Purchasing one of our products or requesting our services;
- ii. If you enter credit card information on the Platform in connection with a purchase, that information is sent directly from your browser to the third-party service provider we use to manage credit card processing and we do not store it on our servers. The service provider is not permitted to use the information you provide except for the sole purpose of credit card processing on our behalf.
- b. Information We Collect Automatically
    - i. When you use the Platform, your device is automatically providing information to us so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use, and operating system version. The information we collect also may include usage information and statistics about your interaction with the Platform. That information may include the URLs of our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device), and other information about how you used the Platform.
    - ii. Automated means of data collection include the following:
      1. **Cookies And Tracking Technologies.** Technologies such as: cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") are used by Wind and our partners (such as advertising, marketing and analytics providers) ("Ad Partners"). We use Cookies to remember users' settings as well as for authentication and analytics. These technologies may be used in analyzing trends, administering the Platform, tracking users' movements around the Platform and to gather demographic information about our user base as a whole. Our Ad Partners may also use such technologies to deliver advertisements to you. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service. For more information on Cookies, how we use them, the third parties we work with who use them, and how you can control them, please see the section entitled Cookie Policy and Ad Choices.
      2. **Log File Information.** Log file information is automatically reported by your browser or mobile application each time you access a website on our Platform. For example, when you access a Wind website, our servers automatically record certain information that your web browser sends when you visit any website. These server logs include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, and pages viewed.
      3. **Device Information.** We collect information about the device you use to access the Platform, including type of device, operating system, settings, and unique device identifiers, and IP address. Whether we collect some or all of this information often depends on what type of device you're using and its settings. For example, different types of information are available depending on whether you're using a Mac or a PC, or an iPhone or Android phone. We collect the device type and any other information you choose to provide, such as username, geolocation, or email address.

### 3. How We Use Information

- a. We use the information we collect to provide our services. In order for us to best provide our services, it is essential that we are able to collect and use the information as described in this Policy. So it is largely necessary for fulfilling the relationship we have with you, and, where that is

not the case, we have a legitimate interest in using the information we collect, including personal information, for these purposes:

- i. to communicate with you or initiate communication with you regarding your Wind account, products, support, services, opportunities customer inquiries or requests through means such as email, telephone (including mobile phone), or postal mail, including through the use of contact information that you provide to us or (where it is lawful for us to do so) that we otherwise obtain from third-party resources;
  - ii. to provide you with personalized content, services offered by Wind as well as promotional content and services;
  - iii. to customize and improve the features, performance, and support of the site;
  - iv. to provide relevant advertising, including interest-based advertising from us;
  - v. for internal operations, including troubleshooting, data analysis, testing, research, and service improvement (this includes use of your IP address and mobile device information to help diagnose problems with our service and to administer the Platform);
  - vi. to analyze use of the Platform and improve the Platform;
  - vii. to create aggregate and statistical data that does not identify you individually and that we can commercialize (for example, we use mobile device data and IP addresses to gather demographic information);
  - viii. for other purposes that you separately authorize as you interact with Wind.
- b. When we collect any information that does not identify you as a specific natural person ("Non-Personal Information"), we are permitted to use and disclose this information for any purpose, notwithstanding anything to the contrary in this Policy, except where we are required to do otherwise by applicable law. Examples of Non-Personal Information include: physical location information; demographic information, including gender, dates of birth, ZIP codes, etc.; or any personal information that has been anonymized, aggregated or de-identified. If we combine any Non-Personal Information with your personal information (such as combining your ZIP code with your name), we will use and disclose such combined information as personal information in accordance with this policy. Similarly, if applicable law requires that we treat certain Non-Personal Information as personal information, we will use and disclose this information as personal information in accordance with this policy.

#### **4. How We Share Information**

- a. Wind does not sell your personal information to third parties. We only disclose your personal information to third parties as follows:
  - i. We use affiliated and unaffiliated service providers (including web servers, cloud storage systems, CRM providers, email services, content support teams, marketing partners, advertising partners, and others) to help us deliver our service and run our business subject to strict confidentiality agreements. These companies are authorized to use your personal information only as necessary to provide these services to us;
  - ii. We will disclose data if we believe in good faith such disclosure is necessary (1) to comply with relevant laws or to respond to subpoenas or warrants or legal process served on us; (2) to enforce our Privacy Policy; (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; (4) as we otherwise deem necessary and is permitted by applicable laws to protect and defend the rights or property of us, the users of our services, or third parties; or (5) as permitted under applicable laws to meet national security and similar requirements;
  - iii. In reorganization or sale of our company or assets, your data may be transferred, subject to the acquirer and its affiliates accepting the commitments made in this Policy and compliance with applicable law;
  - iv. We will otherwise share personal information with your consent.

#### **Cookie Policy and Ad Choices**

This Cookie Policy describes how The Wind Group ("we", "our", "us") uses Cookies and similar technologies. For more information on our general data privacy practices, please see the Privacy Policy.

## **5. Cookies**

- a. Cookies are small pieces of data that are stored on your computer, mobile phone, or other device when you first visit a page. We use cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") to help us recognize you on the Platform, enhance your user experience, understand usage of the Platform, and show you relevant advertising. After you register on the Platform, we may connect information we collect from the Cookies set by us and our partners with other information received from you. The provision of your data via Cookies is voluntary except for those Cookies that we place on your device because we need them for the performance of our Platform and our services.

## **6. What types of Cookies do we use?**

- a. We use three types of Cookies on the Platform: "session cookies," "persistent cookies," And "third-party cookies". Session Cookies are temporary Cookies that remain on your device until you leave the Platform. A persistent Cookie remains on your device for much longer until you manually delete it (how long the Cookie remains will depend on the duration or "lifetime" of the specific Cookie and your browser settings). Third-party cookies are used by us and third parties to serve ads that are relevant to your interests.

## **7. What are Cookies used for?**

- a. Cookies transmit information about you and your use of the Platform, such as your browser type, search preferences, job titles, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use.

## **8. We use Cookies for things like:**

- a. Preferences and Features
  - i. We use Cookies to enable features, help us provide you with personalized content such as showing you your recent search activity.
- b. Advertising
  - i. We use Cookies to deliver, evaluate and improve advertising, such as by using information about you to provide relevant advertising both on and off the Platform. Our Ad Partners may use a cookie to determine whether you've already been shown an advert or how it performed, or provide us with information about how you interacted with an ad.
- c. Analytics and Performance
  - i. We use Cookies to analyze how our visitors use the Platform and to monitor site performance. These Cookies help us to identify and fix errors, understand and improve services, research and test out different features, and monitor how our visitors reach our sites.
- d. Ad Choices and Managing Cookies
  - i. Wind works with third parties to provide you with personalized, interest-based advertising. We may target ads to you, and measure their performance, on and off the Platform using:
    1. Member-provided profile information;
    2. Your use of the Platform (e.g., search history, web pages visited);
    3. Information inferred from data described above;
    4. IP address or mobile device location information (to the extent you have enabled location tracking on your device);
    5. Cookies (both on and off the Platform) which may include information from the Ad Partners we use to help deliver relevant ads to you.

## **9. How We Work with Third-Party Ad Partners**

- a. When we work with our Ad Partners to serve you personalized, interest-based advertising, we do not share information with them that they can use to identify you or associate with you as a specific individual unless you have instructed us to do so (such as when you fill out a lead form in an ad). Similarly, if one of these Ad Partners have information about you saved in one of their own Cookies on your browser, they use that information to help us send you a relevant ad, but they do not share with us information that we can associate with you as an individual.
- b. We work with third parties, such as Google Analytics, to provide analytics services that use the Cookies set on your device to measure the performance of advertising and track traffic to Wind

generally. We have also implemented [Google Analytics Demographics and Interest Reporting](#), which categorizes Cookie information so that we and third-party service providers can better deliver advertisements that are relevant and useful to you on the Platform and various websites across the internet.

#### **10. Opting Out of Cookies**

- a. Wind Cookies. We use Cookies that are necessary for us to provide the services you use and you cannot opt out of these Cookies on the Platform. You are able to disable placement of some (but not all) Cookies by setting your browser to decline cookies, though this may worsen your user experience. Additionally, you can also control, manage and/or delete cookies via your browser settings. A useful resource for information about deleting and controlling cookies can be found at [AboutCookies.org](#).
- b. If you enable location data for the mobile version of the Platform (including any version installed as a native application), we may use your location data to serve you geo-targeted. In such instances, we do not share your location with the advertiser or advertising network; rather, we provide the advertiser or advertising network with a means to push ads through to users located in certain areas. You may disable location services at any time in your device privacy.

#### **11. Ad Partner Cookies**

- a. Here are some options for managing the third-party Cookies used by our Ad Partners:
  - i. You are able to opt out of other third-party advertiser and ad network placement of Cookies or targeted advertising generally by visiting the following links: [Network Advertising Initiative](#); [Digital Advertising Alliance](#); [European Interactive Digital Advertising Alliance](#) (for users in the EU); [The Digital Advertising Alliance of Canada](#); You will continue to receive generic ads by companies not listed with these opt-out tools.
  - ii. You can opt out of tracking by Google Analytics and Google Analytics Demographics and Interest Reporting services by visiting [Google Ads Settings](#) or by downloading the [Google Analytics Opt-Out Browser Add-on](#).
- b. Please note: If ads or other features on the Platform are provided by third parties, those parties set and use their own Cookies that are subject to those third parties' privacy notices and policies. Wind does not have access to, or control over, these Cookies. Also, if you respond to ads posted by third parties or submit information to third parties via the Platform, such third parties receive information about you subject to their privacy policies.

#### **12. Do Not Track Signals**

- a. We do not currently respond to 'do not track' signals and similar settings or mechanisms. When you use the Platform, we try to provide a customized experience.

### **Other Important Privacy Information**

#### **13. EEA Resident Rights**

- a. If you are a resident of the European Economic Area, you have the following data protection rights:
- b. If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us at [info@windcorp.com](mailto:info@windcorp.com)
- c. In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at [info@windcorp.com](mailto:info@windcorp.com).
- d. You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. If you are an unregistered user, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), you may contact us at [info@windcorp.com](mailto:info@windcorp.com)
- e. Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- f. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

- g. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

#### **14. How Long We Keep Your Personal Information**

- a. We keep your personal information only so long as we need it to provide the Platform to you and fulfill the purposes described in this Policy. This is also the case for anyone that we share your personal information with and who carries out services on our behalf. Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements, we'll either remove it from our systems or depersonalize it so that we can't identify you.

#### **15. Security Safeguards**

- a. We employ physical, electronic, and managerial measures to safeguard the information we collect online. However, no company can fully eliminate security risks, so we cannot make guarantees about any part of our services.

#### **16. International Transfer**

- a. The information about you that we collect, process and/or use through the Platform are hosted on servers inside and outside the United States. If you are located in the European Union or elsewhere outside of the United States, information that we collect (including through cookies) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws may not offer the same level of protection as those in the country where you reside or are a citizen. By using our Platform and providing information to use, you consent to the transfer to and processing of information in the United States.

#### **17. Updates to Our Privacy or Cookie Policies**

- a. The Wind Group reserves the right to change how we handle the information we collect and process through our website at any time. These Policies will be updated promptly to reflect any such changes. If you have any questions about these Policies, please contact us via email at [info@windcorp.com](mailto:info@windcorp.com)

#### **18. Contact Us**

- a. If you have any questions or suggestions regarding these Policies, please contact us at:  
The Wind Group  
Attn: Legal Department  
30 Pecks Lane  
Newtown, CT 06470  
USA